

§ 1.904(f)-0T

or certain distributions from a FSC or former FSC.

(i) Recapture of separate limitation loss or overall foreign loss incurred in a pre-2007 separate category for passive income, certain dividends from a DISC or former DISC, taxable income attributable to certain foreign trade income or certain distributions from a FSC or former FSC.

(ii) Recapture of separate limitation loss with respect to a pre-2007 separate category for passive income, certain dividends from a DISC or former DISC, taxable income attributable to certain foreign trade income or certain distributions from a FSC or former FSC.

(2) Losses related to pre-2007 separate categories for shipping, financial services income or general limitation income.

(i) Recapture of separate limitation loss or overall foreign loss incurred in a pre-2007 separate category for shipping income, financial services income or general limitation income.

(ii) Recapture of separate limitation loss with respect to a pre-2007 separate category for shipping income, financial services income or general limitation income.

(3) Losses related to a pre-2007 separate category for high withholding tax interest.

(i) Recapture of separate limitation loss or overall foreign loss incurred in a pre-2007 separate category for high withholding tax interest.

(ii) Recapture of separate limitation loss with respect to a pre-2007 separate category for high withholding tax interest.

(4) Elimination of certain separate limitation loss accounts.

(5) Alternative method.

(6) Effective/applicability date.

[T.D. 9371, 72 FR 72596, Dec. 21, 2007; T.D. 9452, 74 FR 27886, June 11, 2009, T.D. 9521, 76 FR 19273, Apr. 7, 2011]

§ 1.904(f)-0T Outline of regulation provisions (temporary).

This section lists the headings for §§ 1.904(f)-1T, 1.904(f)-2T, 1.904(f)-7T and 1.904(f)-8T.

§ 1.904(f)-1T Overall foreign loss and the overall foreign loss account (temporary).

(a)(1) [Reserved] For further guidance, see the entry for § 1.904(f)-1(a)(1) in § 1.904(f)-0.

(2) Application to post-1986 taxable years.

(b) through (d)(3) [Reserved] For further guidance, see the entries for § 1.904(f)-1(b) through (d)(3) in § 1.904(f)-0.

(d)(4) Adjustments for capital gains and losses.

(e) through (f) [Reserved] For further guidance, see the entries for § 1.904(f)-1(e) through (f) in § 1.904(f)-0.

(g) Effective/applicability date.

26 CFR Ch. I (4-1-12 Edition)

(h) Expiration date.

§ 1.904(f)-2T Recapture of overall foreign loss (temporary).

(a) and (b) [Reserved] For further guidance, see the entries for § 1.904(f)-2(a) and (b) in § 1.904(f)-0.

(c) Section 904(f)(1) recapture.

(1) In general.

(c)(2) through (d) [Reserved] For further guidance, see the entries for § 1.904(f)-2(c)(2) through (d) in § 1.904(f)-0.

(e) Effective/applicability date.

(f) Expiration date.

§ 1.904(f)-7T Separate limitation loss and the separate limitation loss account (temporary).

(a) Overview of regulations.

(b) Definitions.

(1) Separate category.

(2) Separate limitation income.

(3) Separate limitation loss.

(c) Separate limitation loss account.

(d) Additions to separate limitation loss accounts.

(1) General rule.

(2) Separate limitation losses of another taxpayer.

(3) Additions to separate limitation loss account created by loss carryovers.

(e) Reductions of separate limitation loss accounts.

(1) Pre-recapture reduction for amounts allocated to other taxpayers.

(2) Reduction for offsetting loss accounts.

(3) Reduction for amounts recaptured.

(f) Effective/applicability date.

(g) Expiration date.

§ 1.904(f)-8T Recapture of separate limitation loss accounts (temporary).

(a) In general.

(b) Effect of recharacterization of separate limitation income on associated taxes.

(c) Effective/applicability date.

(d) Expiration date.

[T.D. 9371, 72 FR 72596, Dec. 21, 2007]

§ 1.904(f)-1 Overall foreign loss and the overall foreign loss account.

(a)(1) *Overview of regulations.* In general, section 904(f) and these regulations apply to any taxpayer that sustains an overall foreign loss (as defined in paragraph (c)(1) of this section) in a taxable year beginning after December 31, 1975. For taxable years ending after December 31, 1984, and beginning before January 1, 1987, there can be five types of overall foreign losses: a loss under each of the five separate limitations contained in former section 904(d)(1)(A) (passive interest limitation), (d)(1)(B) (DISC dividend limitation), (d)(1)(C)